

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

:

CASE NO.

Plaintiff,

:

v.

:

TRAJEAN ELIJAH BOYD, (1)
(Counts 1, 2, 3, 4, 5, 6 & 7)

:

INDICTMENT

18 U.S.C. § 371

18 U.S.C. § 1028(a)(1)

:

18 U.S.C. § 1028(a)(2)

ZIA ZYNIA POSEY, (2)

:

18 U.S.C. § 1028(a)(3)

(Counts 1, 2, 3, 4, 5, 6 & 7)

:

18 U.S.C. § 1028(a)(5)

18 U.S.C. § 1028(a)(8)

Defendants.

:

18 U.S.C. § 1028A(a)(1)

THE GRAND JURY CHARGES THAT:

COUNT 1
[18 U.S.C. § 371]

Beginning on an exact date unknown but at least by on or about February 19, 2021 and continuing through the date of this indictment, both dates being inclusive, while in the Southern District of Ohio and elsewhere, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY**, along with other individuals, both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree, by and between themselves, to commit certain offenses against the United States, to include: identification document fraud in violation of 18 U.S.C. §§ 1028(a)(1), (a)(2), (a)(3), (a)(5) and (a)(8).

FILED
RICHARD W. HAGEL
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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION
3-22-cr-0126
THOMAS M. ROSE

OBJECTS OF THE CONSPIRACY

It was an object of the conspiracy for the conspirators to engage in a fraud scheme designed to illicitly purchase and acquire from illicit web sites located on the so called *Dark Web* third party personal identification information (PII) to include: names, addresses, social security numbers, dates of birth and driver's license numbers, email addresses, email passwords and mother's maiden names.

It was further an object of the conspiracy for the conspirators thereafter to manufacture counterfeit state driver's licenses utilizing the aforesaid illicitly acquired PII.

It was further an object of the conspiracy for the conspirators to sell these counterfeit state driver's license to other criminals for profit.

It was further an object of the conspiracy for the conspirators to use these counterfeit state driver's licenses to fraudulently apply for credit card accounts with various retailers to include Home Depot, Lowes, Menards, Neiman Marcus, Saks Fifth Ave., Wall-Mart, Dick's Sporting Goods and AT&T.

It was further an object of the conspiracy for the conspirators to utilize these fraudulently opened credit card accounts to illicitly purchase merchandise from said retailers so the conspirators could re-sell this merchandise at dramatically discounted prices on the internet.

It was further an object of the conspiracy for the conspirators to conceal, disguise and insulate their respective identities and roles played in carrying out this fraud scheme and artifice from: the victim retail stores, the third party individuals whose PII the conspirators fraudulently acquired and purchased off the *Dark Web*, the financial institutions and businesses that issued and managed the various fraudulently opened credit card and checking accounts, law enforcement officials and prosecution authorities.

It was further an object of the conspiracy for the conspirators to enjoy the criminal fruits, proceeds and benefits of the fraud scheme.

THE MANNER AND MEANS

It was part of the conspiracy that the defendants would employ deceit, craft, trickery and other dishonest means to steal, and illicitly acquire PII to include: names, addresses, social security numbers, dates of birth and driver's license numbers, email addresses, email passwords and mother's maiden names.

It was further a part of the conspiracy that the defendants would use the counterfeit driver's licenses they manufactured to fraudulently apply for and acquire credit card accounts that they would use to fraudulently acquire a various goods and services to include: rented hotel rooms, rented motor vehicles and the purchase of various retail merchandise for their personal use and re-sale.

It was further part of the conspiracy that the defendants purchased and acquired in excess of 100 individual's PII off the *Dark Web*, manufactured in excess of 175 counterfeit driver's licenses that directly and indirectly were used to steal in excess of \$265,000 worth of goods and services from various retailers, businesses and individuals.

OVERT ACTS

In furtherance of this conspiracy, and to effect the object thereof, at least one member of the conspiracy committed at least one of the following overt acts while in the Southern District of Ohio:

- a. On or about January 23, 2022, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY** rented a room at the Marriott-Dayton Hotel in Dayton, Ohio using a counterfeit driver's license of "W.R." which listed the address of 490 NW Westover Drive, Atlanta, GA 30305.

- b. On aforesaid date and location, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY** abandoned in their rented hotel room various items of document-making implements, to wit: used bottles of Gorilla Glue, razor blades, Hewlett-Packard Brand glossy photo paper, printed photos of identification cards, and debit/credit cards.
- c. On or about January 24, 2022, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY** rented a room at the Residence Inn in Mason, Ohio using a counterfeit driver's license of "W.R." which listed the address of 490 NW Westover Drive, Atlanta, GA 30305.
- d. On or about January 27, 2022, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY** rented a room at the Marriott-Dayton Hotel in Dayton, Ohio.
- e. On aforesaid date and location the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY** abandoned in their rented hotel room various items of document-making implements, to wit: used bottles of Gorilla Glue, Hewlett-Packard Brand glossy photo paper, and laminate sheets.
- f. On or about March 15, 2022 at or near 1900 N. Gettysburg Ave. in Dayton, Ohio, defendant **TRAJEAN ELIJAH BOYD** possessed a counterfeit Missouri driver's license bearing the name and PII of "J.N."; another counterfeit Missouri driver's license in the name and PII of "R.S."; a counterfeit Ohio driver's license bearing the name and PII of "M.K."; and a counterfeit Credit One Platinum Visa credit card bearing the name "B.C."

All in violation of 18 U.S.C. § 371.

COUNT 2
[18 U.S.C. §§ 1028(a)(1) and 2]

Beginning on an exact date unknown but at least by on or about February 19, 2021 and continuing through the date of this indictment, both dates being inclusive, while in the Southern District of Ohio and elsewhere, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY**, did knowingly and without lawful authority produce certain false identification documents which contained information concerning particular individuals, to wit, drivers licenses that appeared to have been issued by or under the authority of a state government to include: Louisiana, New York, Kentucky, South Carolina, Connecticut, Illinois, Ohio, Wisconsin, Indiana,

California, Georgia, Michigan, Florida, Tennessee, Missouri, Texas, Pennsylvania, West Virginia, Colorado, and Oklahoma and was in or affected interstate commerce.

In violation of 18 U.S.C. §§ 1028(a)(1) and 2.

COUNT 3
[18 U.S.C. §§ 1028(a)(2) and 2]

Beginning on an exact date unknown but at least by on or about February 19, 2021 and continuing through the date of this indictment, both dates being inclusive, while in the Southern District of Ohio and elsewhere, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY**, did knowingly transfer false identification documents which contained information concerning particular individuals, to wit, drivers licenses that appeared to have been issued by or under the authority of a state government to include: Louisiana, New York, Kentucky, South Carolina, Connecticut, Illinois, Ohio, Wisconsin, Indiana, California, Georgia, Michigan, Florida, Tennessee, Missouri, Texas, Pennsylvania, West Virginia, Colorado, and Oklahoma but in fact were produced without lawful authority and were in or affected interstate commerce.

In violation of 18 U.S.C. §§ 1028(a)(2) and 2.

COUNT 4
[18 U.S.C. §§ 1028(a)(3) and 2]

Beginning on an exact date unknown but at least by on or about February 19, 2021 and continuing through the date of this indictment, both dates being inclusive, while in the Southern District of Ohio and elsewhere, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY**, did knowingly possess with intent to uses unlawfully or transfer unlawfully five or more false identification documents which contained information concerning particular individuals, to wit, drivers licenses that appeared to have been issued by or under the authority of a state government to include: Louisiana, New York, Kentucky, South Carolina, Connecticut, Illinois,

Ohio, Wisconsin, Indiana, California, Georgia, Michigan, Florida, Tennessee, Missouri, Texas, Pennsylvania, West Virginia, Colorado, and Oklahoma and was in or affected interstate commerce.

In violation of 18 U.S.C. §§ 1028(a)(3) and 2.

COUNT 5
[18 U.S.C. §§ 1028(a)(5) and 2]

Beginning on an exact date unknown but at least by on or about February 19, 2021 and continuing through the date of this indictment, both dates being inclusive, while in the Southern District of Ohio and elsewhere, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY**, did knowingly produce, transfer, or possess document making implements, to wit: a template for constructing false state drivers licenses, computer files, electronic devices, computer hardware, computer software, an embosser, magnetic strip reader, printer, all designed and intended for the making of false identification documents which contained information concerning particular individuals, to wit, drivers licenses that appeared to have been issued by or under the authority of a state government to include: Louisiana, New York, Kentucky, South Carolina, Connecticut, Illinois, Ohio, Wisconsin, Indiana, California, Georgia, Michigan, Florida, Tennessee, Missouri, Texas, Pennsylvania, West Virginia, Colorado, and Oklahoma and was in or affected interstate commerce.

In violation of 18 U.S.C. §§ 1028(a)(5) and 2.

COUNT 6
[18 U.S.C. §§ 1028(a)(8) and 2]

Beginning on an exact date unknown but at least by on or about February 19, 2021 and continuing through the date of this indictment, both dates being inclusive, while in the Southern District of Ohio and elsewhere, the defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY**, did knowingly traffic in false identification documents that was in or affected interstate commerce, and the offense involved the production or transfer of a false identification that appears

to be a state driver's licenses issued by or under the authority of a one or more state governments to include: Louisiana, New York, Kentucky, South Carolina, Connecticut, Illinois, Ohio, Wisconsin, Indiana, California, Georgia, Michigan, Florida, Tennessee, Missouri, Texas, Pennsylvania, West Virginia, Colorado, and Oklahoma.

In violation of 18 U.S.C. §§ 1028(a)(8) and 2.

COUNT 7
[18 U.S.C. §§ 1028A(a)(1) and 2]


Beginning on an exact date unknown but at least by on or about February 19, 2021 and continuing through the date of this indictment, both dates being inclusive, in the Southern District of Ohio and elsewhere, defendants **TRAJEAN ELIJAH BOYD** and **ZIA ZYNIA POSEY**, did, without lawful authority, knowingly possess a means of identification of another person, as defined in 18 U.S.C. § 1028(d)(7), to wit: a unique electronic identification number and access device of an individual whose full identity is known to the Grand Jury, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(4), to wit: Identification Document Fraud in violation of 18 U.S.C. §§ 1028(a)(1), (a)(2), (a)(3), (a)(5) and (a)(8) as previously alleged in this indictment, which is incorporated herein by reference.

In violation of 18 U.S.C. §§ 1028A (a)(1) and 2.

A T R U E B I L L


F O R E M A N

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